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JOHN ASHCROFT
Governor
G. TRACY MEHAN, III
~~FREDERICK A. BROSNICK~~
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

Macon Regional Office
Highway 63 North
P.O. Box 489
Macon, MO 63552
816-385-2129

3.800 Marion-Knapheide
LOW #89-MC005

March 1, 1989

RECEIVED
MAR 06 1989

Mr. Steve Meckes
Manager Human Resources
The Knapheide Manufacturing Company
P.O. Box C140
Quincy, IL 62306

WASTE MANAGEMENT
PROGRAM

Dear Mr. Meckes:

Enclosed is a copy of a Report on Hazardous Waste Generator Inspection, Knapheide Manufacturing Company, West Quincy, Missouri, which I believe is self-explanatory. I trust you will direct your attention to the recommendations contained in the report.

It is requested that you submit a written response outlining what steps have been or will be taken to comply with the recommendations contained in the report. The response should be submitted within 30 days and if corrections cannot be made within the next 30 days, a scheduled date of completion must accompany the response.

If you have any questions regarding the report, please feel free to contact me or Robert Eck in our Macon Regional Office.

Sincerely,

MACON REGIONAL OFFICE

A handwritten signature in dark ink, appearing to read "Charles S. Decker".

Charles S. Decker, P.E.
Regional Administrator

CSD/rel

cc: Waste Management Program
Mark Twain Regional Council of Governments

Enc.



R00035773
RCRA Records Center

REPORT ON HAZARDOUS WASTE GENERATOR INSPECTION
KNAPHEIDE MANUFACTURING COMPANY
WEST QUINCY, MO
P.O. BOX C140
QUINCY, IL 62306
PH 217-222-7131
FEDERAL ID #MOIX00766998

INTRODUCTION

On February 9, 1989, a staff member of the Department of Natural Resources - Macon Regional Office conducted an inspection of the hazardous waste management activities at Knapheide Manufacturing Co. at West Quincy, Missouri. The inspection was conducted to determine compliance with the Missouri Hazardous Waste Management Law (MHWML) and Regulations and the Federal Resource Conservation and Recovery Act (RCRA) and Regulations.

The plant manufactures truck beds and utility bodies. Steel members are cut, shaped and welded to form a framework for a truck bed. Lumber (yellow pine) is shaped (tongue and groove) and cut to an appropriate length to fit the bed framework. The entire unit is sprayed with a paint primer and then finish coat. The truck bed racks or sides, are fabricated much the same but the unit is dipped in paint rather than sprayed. The utility bodies are cut, welded, and primed. Final finish is applied by the distributor. Metal components of the utility bodies and side racks are cleaned with an alkalide cleaning solution supplied by Detrex. The active ingredient in the cleaner is sodium fluosilicate.

There are two (2) hazardous wastestreams generated at present. Waste Xylene is generated at an average rate of 330 gallons per month. The waste solvent is generated in the cleaning of all of the painting equipment. The accumulated waste is shipped quarterly to Petrochem Processing in Detroit, Michigan (MID980615298). The second wastestream is waste oil which is generated at an average rate of 55 gallons/mo. The waste oil is also managed by Petrochem Processing.

Mrs. Kathy Flippin, Environmental Specialist, Waste Management Program, Jefferson City, accompanied the inspector on the inspection. Mr. Steve Meckes, Manager Human Resources; Ms. Gail Helkey, Human Resources Assistant, and Mr. Orville Nieder, Manager, Quality Assurance, represented the company and provided available information.

UNSATISFACTORY FEATURES

1. The hazardous waste manifests did not contain the Missouri hazardous waste manifest document number which is the 5 digit Missouri generator ID number and the consecutive shipment number, as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2A and 5.262(2)(B)4B.
2. The hazardous waste manifest did not contain the Missouri transporter ID number as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2B and 5.262(2)(B)4B.
3. The hazardous waste manifest did not contain the proper DOT shipping name of the wastes as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.2(a) which refers to Part 262 Appendix.

4. Facility personnel did not have placards available to offer the transporter as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.33.
5. The drums of hazardous waste located at satellite accumulation points were not labeled or marked as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(c)(1)(ii).
6. The drums of hazardous waste located at satellite accumulation points were not kept closed as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(c)(1)(i).
7. The hazardous waste storage area was not being inspected and logged weekly as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(1) which refers Section 265.174.
8. Drums of hazardous waste in storage were not dated and marked as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(2) and (3).
9. The drums of hazardous waste in storage were not labeled and marked as required by MHWML Regulation 10 CSR 25-5.262(c)1 which references 40 CFR Section 262.31 and Section 262.32(a) and (b).
10. Ignitable hazardous waste was not being stored at least 50 feet from the property line as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(1) which refers to Section 265.176 and Section 265.17(a).
11. The drums of liquid hazardous waste were not stored in a containment system as required by MHWML Regulation 10 CSR 25-5.262(2)(c)2B.
12. Documentation on employee training did not provide the qualifications of the employee trainer as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16.
13. Personnel training documents did not contain the job title and name of employee filling each job as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(1).
14. Personnel training documents did not include a job description of each person dealing with hazardous waste as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(2).

15. Personnel training documents did not contain the type and amount of introductory and continued training as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(3).
16. There was no device near the hazardous waste storage area capable of summoning emergency assistance as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.32(b).
17. The contingency plan did not list the address of emergency coordinators as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.52(d).

DISCUSSION

Hazardous waste generated at Knapheide is presently being shipped to Michigan and a Michigan manifest is being used. However, it is necessary that all associated Missouri numbers, that is Knapheide's Missouri generator ID number, along with sequentially increasing shipment number and the transporter's Missouri ID number, be included on the shipping document. This information may be placed in the gray shaded area marked "J." The proper DOT shipping name must be used on the manifest. It was suggested that company personnel examine the inbound shipping documents on the solvent and use the same description with the word "waste" before it.

There are four (4) locations in the plant where satellite accumulation occurs. Three (3) of the containers are located in the paint areas and the fourth is in the "crib" (toolroom). All satellite accumulation drums must be labeled indicating contents and the beginning date of accumulation. The containers must also be kept closed except when waste is being added.

After a drum is filled it is removed to the designated hazardous waste storage area. When a drum is placed in the storage area it must be labeled with the hazardous waste label and dated. The appropriate DOT marking must also be placed on the containers. The appropriate DOT placard must also be available to be offered to the transporter at the time the waste is shipped.

A new hazardous waste storage area must be developed. It must be located at least 50 feet from the property line. The storage facility must be constructed in accordance with the criteria contained in MHWML Regulation for facilities storing more than 1000 kg of liquid waste. A copy of the regulation was given to the facility representative at the time of the inspection. The designated hazardous waste storage area must be inspected weekly and a log of the inspection findings kept.

The personnel training documents applicable to hazardous waste are nonexistent. All employees at the plant recently received their Title III, Employee Hazard Communication training; however none of the employees involved in the handling or management of hazardous waste have received any specific training dealing with hazardous waste management. It is required that each such employee receive on-the-job or classroom training and that this be documented. Documents must also be developed showing the job title or position, a description of the activities involved and the name of the person filling each position. A yearly refresher must also be given and the type and amount of annual training must also be recorded.

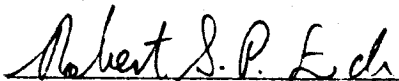
A device capable of summoning emergency assistance must be located at the hazardous waste storage facility. In case of emergency and phones are inoperable, it is necessary that the home address of emergency coordinators be included in the contingency plan.

RECOMMENDATIONS

1. That the hazardous waste manifests contain all Missouri document numbers as required by MHWML Regulation 10 CSR 25-5.262(2)(B)2A, 2B, and 4B.
2. That the proper DOT shipping name be used on the manifest as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.2(a) which refers to Part 262 Appendix.
3. That all drums of hazardous waste in storage be dated and marked as required by MHWML Regulations 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(2) and (3).
4. That all drums of hazardous waste in storage be labeled and marked as required by MHWML Regulation 10 CSR 25-5.262(c)1 which references 40 CFR Section 262.31 and Section 262.32(a) and (b).
5. That placards be made available to offer the transporter as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.33.
6. That the drums of hazardous waste located at satellite accumulation points be labeled and marked as required by MHWML Regulations 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(c)(1)(ii).
7. That the drums of hazardous waste located at satellite accumulation points be kept closed, except when filling, as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(c)(1)(i).
8. That the hazardous waste storage area be inspected weekly as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(1) which refers to Section 265.174.

9. That the hazardous waste storage area be located at least 50 feet from the property line as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(1) which refers to Section 265.176 and Section 265.17.
10. That the hazardous waste be stored in a containment system meeting the criteria found in MHWML Regulation 10 CSR 25-5.262(2)(c)2B.
11. That records of the qualifications on the employee trainer be provided as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16.
12. That personnel training documentation contain the job title and name of employee filling each position as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(1).
13. That personnel training documentation include a job description of each person dealing with hazardous waste as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(2).
14. That personnel training documentation contain the type and amount of introductory and continued training as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.16(d)(3).
15. That an appropriate device be located at the hazardous waste storage area capable of summoning emergency assistance as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.32(b).
16. That the contingency plan contain the address of the emergency coordinator as required by MHWML Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Section 262.34(a)(4) which refers to Section 265.52(d).

INSPECTED BY:



Robert S. P. Eck
Environmental Specialist IV
Macon Regional Office

RSPE/lrs

LARGE QUANTITY GENERATOR CHECKLIST

Form LOG-INSP
(10-15-88)

Name of Facility: Knapheide Mfg. Co

Date: 2/9/89

Address: P.O. Box C140
Quincy, Ill. 62306

Other Inspections Done:
RR TRANS LDR
OTHER

Phone: (217) 222-7131 MO ID# 04809

EPA ID# MOD000766998

Facility Representative: Title:

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Fabrication of truck beds & utility bodies.

List of wastes generated. (Use continuation sheet, if needed.)

"88"	Waste	Amount/Month	Disposition
1.	<u>Waste Xylene</u>	<u>330 gal/mo. Ave.</u>	<u>Petrochem Process.</u>
2.	<u>Waste Oil</u>	<u>5 gal/mo Ave</u>	<u>" "</u>
3.	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>
5.	<u> </u>	<u> </u>	<u> </u>

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. No. Mo. #
Manifest document number (MO I.D. & Shipment #).
EPA Waste I.D. codes
Generator's name, address, phone #
All Transporters' names, phone #'s, MO and EPA I.D. #'s No. Mo. #
Designated facility name, address, phone # and MO and EPA I.D. #
Proper DOT Shipping Name, Hazard Class and I.D. #
Containers, Quantity and Unit Wt/Vol being shipped properly designated
Proper certification including waste minimization.
Manifest properly signed and dated
No more than 10 days time between generator and facility signatures.
Manifests returned within 15 days.
If not, exception generator report submitted within 45 days. N/A
Completed manifests and Summary Manifest Report and Certification.
Spills of reportable quantities reported to DNR.

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport.
Placards available for use by transporters 4 sites
Satellite accumulation requirements met (if applicable).
a. Stored in satellite areas less than 1 year.
b. Containers marked identifying contents and beginning date
c. Containers kept closed/compatible/good condition.
d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hazardous waste).

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. 1/wk. not 1/mo.
Date of accumulation marked.
Storage less than 90 days (unless small quantity generator).

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition
Containers kept closed in storage.
Containers storing incompatible waste separated or protected from each other.
Containers of ignitable or reactive waste stored > 50 feet from property line
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B.

22 barrels in storage

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. ☒

Completed classroom or on-the-job training. ☒

Job title, description, and name of person filling position ☒

Written record of the type and amount of training given ☒

Documentation confirming that training has been given ☒

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. ☒

Device in the hazardous waste operation area capable of summoning emergency assistance. ☒

Fire control, spill control, and decontamination equipment available. ☒

Adequate water supply for fire control equipment. ☒

Adequate and proper safety equipment available. ☒

Adequate aisle space. ☒

Arrangements with local emergency agencies. ☒

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. ☒

Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. ☒

Describe formal arrangements with emergency agencies. ☒

Name, addresses, and phone numbers (home & office) of emergency coordinators. ☒

Emergency equipment including its description and location. ☒

Evacuation plan if applicable ☒

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained ☒

Waste oil properly stored and transported ☒

1/6/89

✓ Title III training
✓ Employee Hazard Communication

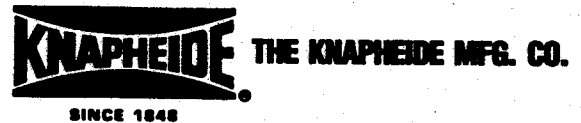
Letter sent to
emerg. agencies
one reply

Letter sent
Need Address

check on
need for contract



GAIL HELKEY
HUMAN RESOURCES ASSISTANT



STEVE MECKES
MANAGER, HUMAN RESOURCES

P.O. Box C-140, 436 South Sixth, Quincy, Illinois 62306-2140 • (217) 222-7131
FACSIMILE NO. (217) 222-6938 OR (800) 854-8987

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FACSIMILE NO. (217) 222-6938 OR (800) 854-8987

Inspector Signature & Title:

Office:

M E C h E. S. IV
MRO

IN COMPLIANCE ☒

IN VIOLATION OR
ABSENT ☐